April 12, 2012

James S. Haklar, Ph.D., P.E.,
Sr. PCB Disposal Specialist
Pesticides and Toxic Substances Branch
United States Environmental Protection Agency, Region 2
2890 Woodbridge Avenue (MS-105)
Edison, New Jersey 08837-3679

RE: Excavation Water Management – Former Nuodex Corporation Facility
Fords, New Jersey

Dear Dr. Haklar,

EPEC Polymers, Inc. (EPEC) is providing the following information regarding water management issues encountered during remediation activities at the Former Nuodex Corporation Facility (Site). The information contained herein is presented in response to your verbal request during our phone call on April 6, 2012.

Ongoing environmental remediation is occurring at the Site that includes the removal of lead-impacted soil in accordance with the Site's NJDEP-approved Remedial Action Workplan (RAW). The lead impacted area is co-located with PCB impacts from the Hatco Site.

The lead impacted soil excavation area is located in a portion of the site that is bounded on the North by wooded wetlands, to the East and south by wetlands, and to the West by a former pond (Hartman's Pond) which has been filled with coarse aggregate as part of the remedial activities. The lead impacted soil formerly served as a berm that contained Hartman's Pond from the lower-lying inundated wetlands to the North and East. The lead and PCB impacted areas extend laterally from the top of the former berm into the wetlands to the North and East as shown on the attached figure.

The excavation in the higher portion of the lead-impacted area became inundated with water. Excavation within the lower lying wetlands to the East was also conducted in accordance with a phased excavation approach. The attached sketch outlines the excavation areas that are inundated by water.

As detailed during our April 6, 2012 conversation, water from the western portion of the excavation was allowed to drain to the eastern portion of the excavation. The location of the water transfer is reflected on the attached figure. Water flowing into the eastern portion of the excavation was within the alignment of the SESC provisions (i.e., haybales).

The estimated volume of water that migrated between these areas is between 15,000 and 18,000 gallons based on visual estimate of the inundated area and depth of water. Once further drainage was blocked, the standing water level in the western portion of the excavation rapidly rebounded due to continued percolation.

Pursuant to our discussion, a sample was collected on April 6, 2012 from the standing water located within the western portion of the excavation (see attached figure). PCB data from this sample are presented below.

Analyzed Constituent[1]	Analyzed Value (µg/l)	Regulatory Limit (µg/l)
Aroclor 1016	<0.098 [2]	0.5[3]
Aroclor 1221	<0.49 [2]	0.5[3]
Aroclor 1232	<0.41 [2]	0.5[3]
Aroclor 1242	<0.17 [2]	0.5[3]
Aroclor 1248	<0.16 [2]	0.5[3]
Aroclor 1254	<0.11 [2]	0.5[3]
Aroclor 1260	<0.12 [2]	0.5[3]

Notes:

1) A water sample was collected from the excavation on April 6, 2012.
2) The listed value reflects the Method Detection Limit (MDL) for each aroclor.
3) The PCB limit is based on TSCA unrestricted use criteria/Maximum Contaminant Level.

Based on the analytical results, the transfer of water within the excavation did not convey PCB-impacted water.

I hope that this information sufficiently clarifies this issue. If you require additional information, please feel free to contact me.

Best Regards,

Robert Cornez
EPEC Polymers, Inc.

Attachment:

Figure – Lead Berm Excavation Delineation and Sample Location

cc: Anthony Findley – Office of Brownfield Reuse
Steve Kessel – Brown & Caldwell
file

CONSERVATION EASEMENT AND WP IMPACT LIMIT

CURRENT LOCATION OF EXCAVATED SLAG SIDEWALL

PERCHED WATER SEEP (APPROX)

APPROXIMATE LOCATION OF HYDRAULIC BARRIER

APPROXIMATE LOCATION OF WATER TRANSFER

* APPROXIMATE TOP OUTSIDE EDGE OF WORKING PLATFORM

* APPROXIMATE TOP INSIDE EDGE OF WORKING PLATFORM

AOC-07A_WSO_040612
Approximate location of water sample collection

CO-LOCATED MATERIALS WITH LEAD >21,000 mg/kg AND PCB's >50 mg/kg (~14 CY) (AREA EXCAVATED AND CONFIRMED CLEAN)

EXTENT OF DISTURBANCE (LURP/ACOE PERMIT)

*: PRELIMINARY ALIGNMENT FOR WORKING PLATFORM BY PS&S

N

25 0 25 50
SCALE IN FEET

Note:

1. Delineations shown are approximate.

Legend

- Property Boundary
- Former Buildings and Tanks
- Former Railroad
- Eastern Extent of Proposed Excavation
- BMP" (Hay Bales)
- TSCA Excavation area
- Wetlands (NJDEP - Approved LOI, 2009)
- Excavated area as of 4/5/12
- Water in excavated area
- 800 ppm lead zone
- 21,000 ppm lead zone

SOURCE:
-FROM BROWN AND CALDWELL, PROJECT # 140408, FIGURE 2 TITLED "DELINEATION OF LEAD-IMPACTED FILL MATERIAL AND PCB IMPACTED MATERIAL (PCB RESULTS SHOWN", DATED 7-12-2011).

LEAD BERM EXCAVATION DELINEATION AND SAMPLE LOCATION

FORMER NUODEX CORP. FACILITY
INDUSTRIAL AVENUE
FORDS, NEW JERSEY

USA ENVIRONMENT, L.P.
A Full Service Environmental Company

DATE
APRIL, 2012

PROJECT NUMBER
2493-RC-C253